

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA – HARRISBURG

	:	CIVIL ACTION NO. 1:22-cv-01664-MCC
Homesite Insurance Company Of The Midwest	:	
V.	:	
Omar Ewideh	:	
	:	
Nivertiti Geaith	:	Hon. Martin Carlson
	:	

Motion For Protective Order And Leave To Proceed In

Pseudonym

And now this 23rd day of January, 2023 Defendants hereby move for this honorable court to enter an order granting Defendants Motion For Protective Order and Leave to Proceed In Pseudonym and avert the following in support thereof.

Defendants hereby move for the court to allow to proceed anonymously given substantial harm exists if not allowed to. It is hereby requested that the court enter an order Granting Defendant Ewideh to Proceed as John Doe and Geaith as Jane Doe.

Plaintiff has made accusations that put Defendants in significant financial harm as well as well as the harm to Cross Country Mortgage and Defendants of other Homeowners Insurance Companies becoming privy to this action or Plaintiffs disclosure would sway other insurers to not issue a policy. Homesite Insurance have made statements relevant to this litigation that put Defendant in harm as to being a Penn State University Junior and about to start applying to law schools. Although this lawsuit presents a number of unfounded accusations by it being publicly available it presents a real harm. It is also alleged that Defendant Ewideh is of a certain sexuality and on occasion was called homophobic slurs by the Large Loss Property Manager Of AFICS/Homesite. By public disclosure and Plaintiffs being allowed to continue with disclosure it would pose a safety risk for

Defendant and Defendant comes from a very religious family background. Both Defendants would require to be sealed due to that as well as given that Nivertiti is Defendant Ewideh Mother. A protective order preventing disclosure is requested and brief in support and proposed order to follow.

Wherefore for the above reasons it is respectfully requested this court enter an order directing the clerk to change the caption to John and Jane Doe and order that Plaintiff begin to identify Defendants with Pseudonym and not disclose the details of the case.

Respectfully Submitted,

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Date 1/23/23